

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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JUL 10 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
LCI International Corp. and	)	
Competitive Telecommunications	)	RM-9101
Association Petition for Expedited	)	
Rulemaking Concerning the	)	
Requirements Governing Operations	)	
Support Systems	)	
	)	
Implementation of the Local	)	CC Docket 96-98
Competition Provision in the	)	
Telecommunications Act of 1996	)	
of the Communications Act of 1934	)	

Comments of General Communication, Inc.

General Communication, Inc. (GCI) hereby supports the Petition for Expedited Rulemaking filed by LCI Telecom Corp. (LCI) and Competitive Telecommunications Association (CompTel) to establish reporting requirements and performance and technical standards for operations support systems (OSS). Parity and nondiscriminatory access to incumbent local exchange carrier (ILEC) OSS functions are vital to achieving local competition, the goal of the Telecommunication Act of 1996.

Without nondiscriminatory access and parity to OSS functions the competitive LEC (CLEC) will not be able to provide real competition to the ILEC. In GCI's experience, implementing OSS functions gives the ILEC incredible opportunity for delay and incredible opportunity to discriminate. Without standards, the ILEC will not implement a system that truly provides for parity between

the carriers.

All ILECs, not just the Regional Bell Operating Companies (RBOCs), must comply with the standards outlined in the Petition. Nondiscriminatory access and parity to OSS functions is important for all CLECs, not just those that choose to compete with RBOCs.<sup>1</sup> Smaller ILECs may claim that they can not meet the standards outlined in the Petition. The Commission and the state commissions must stand firm in adopting these standards for all ILECs. The Commission and the state commission could then allow the ILECs an opportunity during the arbitration process to prove that they cannot meet the standards. However, the Commission and the state commissions must make it clear that an ILEC must come into compliance with the standards within a specific time frame.<sup>2</sup> During that timeframe, the ILEC should be

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<sup>1</sup>GCI is a telecommunications carrier in Alaska. No RBOC serves Alaska. GCI and other CLECs that compete with non-RBOCs should have the same nondiscriminatory access to OSS functions. Otherwise, competition will be impeded in non-RBOC territories. GCI has an agreement with the largest ILEC in the state and is negotiating with others. The Commission must address this issue now for non-RBOCs since CLECs are seeking to provide competition in non-RBOC areas.

<sup>2</sup>Nondiscriminatory access and parity to OSS functions is as important to local competition as equal access has been (and continues to be) to long distance competition. Non-RBOC ILECs were given up to three years to convert to equal access after receiving a request from an interexchange carrier. The Commission must not allow the ILEC to delay implementation of the OSS standards for such a long period of time. Many of the ILECs use the same type of systems as the RBOCs and therefore should be able to implement the standards in a timely manner. To allow the non-RBOC ILECs more than 6 months to comply with these standards will only impede and delay competition and discriminate against consumers in non-RBOC areas. The

required to submit quarterly parity reports to the Commission and the state commission and demonstrate its efforts in complying with the standards.

The Commission should adopt the proposed standards as outlined in the Petition for all ILECs.

Respectfully submitted,

GENERAL COMMUNICATION, INC.

A handwritten signature in cursive script, appearing to read "Kathy L. Shobert", written over a horizontal line.

Kathy L. Shobert  
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July 10, 1997

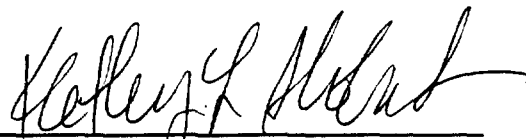
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Commission should also adopt penalties for non-compliance.

**STATEMENT OF VERIFICATION**

I have read the foregoing, and to the best of my knowledge, information and belief there is good ground to support it, and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

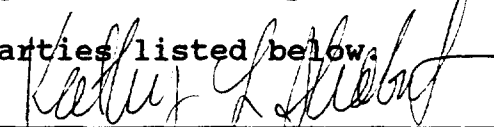
Executed July 10, 1997.

A handwritten signature in cursive script, appearing to read "Kathy L. Shobert", written over a horizontal line.

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**CERTIFICATE OF SERVICE**

I, Kathy L. Shobert, hereby certify that true and correct copies of the foregoing were served by first class mail, postage prepaid to the parties listed below:

  
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